

**IN THE UNITED STATES OF AMERICA  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

Carmen Purl, M.D.; and Carmen Purl,  
M.D., PLLC d/b/a Dr. Purl's Fast Care  
Walk In Clinic,

*Plaintiffs,*

v.

United States Department of Health and  
Human Services; Xavier Becerra, in his  
official capacity as Secretary of the  
United States Department of Health and  
Human Services; Office for Civil Rights  
of the United States Department of  
Health and Human Services; and Melanie  
Fontes Rainer, in her official capacity as  
Director of the Office for Civil Rights of  
the United States Department of Health  
and Human Services,

*Defendants.*

Civil Action No. 2:24-cv-228-Z

**PROPOSED INTERVENOR-DEFENDANTS' MOTION FOR LEAVE TO INTERVENE**

Pursuant to Fed. R. Civ. P. 24(a) and (b), the City of Columbus, Ohio, the City of Madison, Wisconsin, and Doctors for America ("Proposed Intervenor-Defendants") respectfully move for leave to intervene as defendants in the above-captioned case. Proposed Intervenor-Defendants seek to intervene as to both counts. The accompanying Memorandum sets out why the Court should grant Proposed Intervenor-Defendants' motion. A Proposed Order Granting the Motion for Leave to Intervene is attached as Exhibit 1, a Proposed Motion for Summary Judgment is attached as Exhibit 2, a Memorandum in Support of that Motion is attached as Exhibit 3, an

appendix in support of that Motion is attached as Exhibit 4, and a Proposed Order granting that Motion is attached as Exhibit 5.

Date: January 17, 2025

Respectfully submitted,

/s/ Ryan P. Brown

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*Counsel to City of Columbus and City of Madison*

**CERTIFICATE OF CONFERENCE**

I certify that on January 15, 2025, counsel for Proposed Intervenor-Defendants conferred with counsel for the Defendants regarding this Motion. Counsel for the Defendants stated that they oppose Proposed Intervenor-Defendants' intervention. I further certify that counsel for Proposed Intervenor-Defendants conferred with Plaintiffs' counsel regarding this Motion on January 15, 2025. Counsel for the Plaintiffs also stated that Plaintiffs oppose this motion. Proposed Intervenor-Defendants disagree and so file this motion.

/s/ Ryan P. Brown  
Ryan Patrick Brown

**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2025, a copy of the foregoing was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Ryan P. Brown  
Ryan Patrick Brown